



189974



DEpstein:ew  
202/514-7455

Washington, D.C. 20530

March 4, 1999

Patricia Simmons  
Remedial Project Manager  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 20th Floor  
New York, New York 10007

Dear Ms. Simmons:

This refers to your letter dated February 15, 1999, in which you request information and documents relating to the contamination at the LCP Chemicals, Inc. Site in Union County, New Jersey.

Your letter references the ownership and seizure by the U.S. Government in 1942 of General Aniline and Film Corporation pursuant to the Trading With the Enemy Act. You indicate that this request is submitted to this office as the successor to the Office of Alien Property.

Unfortunately, I have no records or information which would be responsive to your request. Attached for your information are excerpts from a letter dated March 4, 1966, from the Office of Alien Property relative to the sale of the share of General Aniline and Film Corporation (GAE). As the letter explains, although 90% of the shares were seized by the United States, it remained a private company and the Attorney General in no way interfered in the day-to-day operations of the corporation.

I have discussed the matter with Larry Easterling, Alien Property Custodian, in the Civil Division, who concurs in my view of the situation. If you have any additional questions, please contact him at 202/616-8074.

I regret that I am unable to be of any further assistance.

Sincerely yours,

  
DAVID EPSTEIN

Director  
Office of Foreign Litigation  
Civil Division

Enclosure

cc: Muthu Sundram, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 17th Floor  
New York, New York 10007  
(w/enclosure)

MAR 4 1966

You indicate that you are concerned with information on the sale of Government bonds and land securities and that therefore you are interested in sale of the General Aniline and Film Corporation (GAF) shares. I trust you realize that GAF was never a Government corporation, and that in spite of the fact that more than 90% of its outstanding shares were seized by the United States under the Trading with the Enemy Act during World War II it remained a private corporation under the law as it existed in 1942. The Secretary of the Treasury made the initial seizure and vesting under the Act and shortly thereafter responsibility for stock ownership and control for GAF was transferred to the Alien Property Custodian, who was later succeeded by the Attorney General. Thus from about 1946 on a succession of Attorneys General held voting control of the corporation, and as you may know, while the Attorney General elected the Board of Directors, each Attorney General was very careful not to interfere in the day to day operations of the corporation and its officers remained long term employees of the company who had keen knowledge of all of its affairs, and I suspect that the success of the corporation as a going concern was in large part attributable to this beneficial policy.